

Message

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**From:** Xu, Jin@ARB [jin.xu@arb.ca.gov]  
**Sent:** 5/2/2019 5:56:15 PM  
**To:** Stauffer, Panah [Stauffer.Panah@epa.gov]; Ramalingam, Ravi@ARB [Ravi.Ramalingam@arb.ca.gov]; Whitney, Daniel@ARB [daniel.whitney@arb.ca.gov]  
**CC:** Smith, Noah [SMITH.NOAH@EPA.GOV]; Kwong, Jenette@ARB [jenette.kwong@arb.ca.gov]; Andrews, Paul@ARB [Paul.Andrews@arb.ca.gov]; Densberger, Matthew@ARB [Matthew.Densberger@arb.ca.gov]; Mays, Rory [Mays.Rory@epa.gov]; Oda, Dwight@ARB [dwight.oda@arb.ca.gov]  
**Subject:** RE: Reference Documents for Thursday's Call  
**Attachments:** FW: Red Bluff April 12, 2017

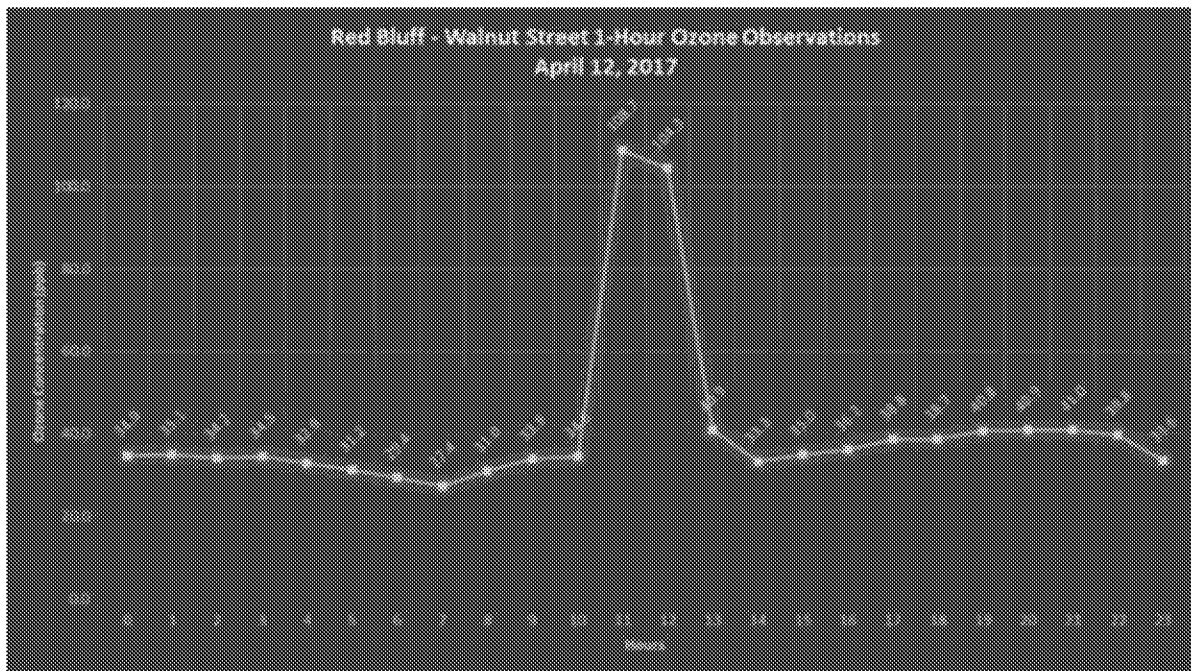
Hi Panah,

We have investigated the causes of the two over 100 ppb ozone observations in the Tehama APCD in 2017. As you can see from the figure below, those two high ozone numbers were recorded on April 12, 2017 at 11:00am and 12:00pm, while the concentrations were ~30-40 ppb for the rest of the day. We looked at the potential effects of exceptional events (fire or stratospheric intrusion). There was no fire in the area during this time period. It was cloudy with a high temperature around 60°F and the observations from the surrounding monitors were all in the 30-45 ppb range. So, we do not think they were caused by fire or meteorological reasons. We then contacted the monitoring staff from the Tehama APCD, and found out (as shown in the attached email thread) that “a zero/span was performed for these two hours and were accidentally included”. Based on the information we have, we believe that these two high ozone numbers should be flagged out. Dwight will add the Null code of AY for the 11 & 12 hour at Red Bluff on April 12, 2017. After these two numbers are removed, the highest hourly ozone concentration in the Tehama APCD during 2015-17 is below 100 ppb. Therefore, we believe that no emergency episode plan is needed for the Tehama APCD.

Please let us know if you have any questions or want to have a further discussion of the issue.

Thanks,  
Jin

**Jin Xu**  
Manager, Air Quality Analysis Section  
Air Quality Planning and Science Division  
California Air Resources Board  
[jin.xu@arb.ca.gov](mailto:jin.xu@arb.ca.gov)  
(916) 327-1511



**From:** Stauffer, Panah <Stauffer.Panah@epa.gov>

**Sent:** Friday, April 26, 2019 10:25 AM

**To:** Xu, Jin@ARB <jin.xu@arb.ca.gov>; Ramalingam, Ravi@ARB <Ravi.Ramalingam@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>

**Cc:** Smith, Noah <SMITH.NOAH@EPA.GOV>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>; Mays, Rory <Mays.Rory@epa.gov>

**Subject:** RE: Reference Documents for Thursday's Call

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Hi Jin,

Our Air Quality Analysis Office was looking at the certified data in AQS from 2015-2017. They noticed that Tehama APCD also crossed the 100 ppb threshold- they reached 108 ppb in 2017. You might already be working with them on an emergency episode plan, but I wanted to share that with you because Tehama APCD wasn't on the table of new Priority 1 areas in the I-SIP submission.

Best,  
Panah

Panah Stauffer  
Air Division (AIR-2)  
US EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
415-972-3247

**From:** Xu, Jin@ARB [mailto:jin.xu@arb.ca.gov]

**Sent:** Thursday, April 04, 2019 8:50 AM

**To:** Stauffer, Panah <Stauffer.Panah@epa.gov>; Ramalingam, Ravi@ARB <Ravi.Ramalingam@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>  
**Cc:** Smith, Noah <SMITH.NOAH@EPA.GOV>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>; Mays, Rory <Mays.Rory@epa.gov>  
**Subject:** RE: Reference Documents for Thursday's Call

Hi Panah,

Thank you for the information regarding Lake County's exemption request. We will discuss it and let you know if we have any questions.

Thanks,  
Jin

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**From:** Stauffer, Panah <Stauffer.Panah@epa.gov>  
**Sent:** Wednesday, April 3, 2019 4:03 PM  
**To:** Xu, Jin@ARB <jin.xu@arb.ca.gov>; Ramalingam, Ravi@ARB <Ravi.Ramalingam@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>  
**Cc:** Smith, Noah <SMITH.NOAH@EPA.GOV>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>; Mays, Rory <Mays.Rory@epa.gov>  
**Subject:** RE: Reference Documents for Thursday's Call

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Hi Jin,

I wanted to let you know that we heard back from our headquarters about the form that the Lake County exemption request should take. They told us that it will need to be a SIP submission that meets the applicable requirements of Appendix V of 40 CFR Part 51. It seems like the public notice requirement could be fulfilled at the district level or at the state level. As we were discussing, depending on how things work with the emergency episode plans for the other districts, there could be an opportunity to do public notice on multiple components together. Headquarters explained to us that a clarification letter wouldn't be enough because the original submittal stated that CARB would be working with the district to develop an emergency episode plan.

Regarding the content of the exemption request, as we discussed on the phone, you can write a letter that requests an exemption for Lake County under 40 CFR 51.152(d)(1) based on the area's attainment status. The request should include some analysis justifying why Lake County is appropriate for exemption. This could include information on the topics below as well as other relevant information.

- The area (population, geography, etc.)
- What may have caused the 1-hour ozone recording over 100 ppb
- The nature of air pollution emergencies in the district
- The composition of NOx and VOC sources in the district

Please feel free to give me a call if you'd like to discuss any of this.

Best,  
Panah

Panah Stauffer  
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**From:** Mays, Rory  
**Sent:** Tuesday, March 12, 2019 9:17 AM  
**To:** Xu, Jin@ARB <[jin.xu@arb.ca.gov](mailto:jin.xu@arb.ca.gov)>; Stauffer, Panah <[Stauffer.Panah@epa.gov](mailto:Stauffer.Panah@epa.gov)>; Ramalingam, Ravi@ARB <[Ravi.Ramalingam@arb.ca.gov](mailto:Ravi.Ramalingam@arb.ca.gov)>; Whitney, Daniel@ARB <[daniel.whitney@arb.ca.gov](mailto:daniel.whitney@arb.ca.gov)>  
**Cc:** Smith, Noah <[SMITH.NOAH@EPA.GOV](mailto:SMITH.NOAH@EPA.GOV)>; Kwong, Jenette@ARB <[jenette.kwong@arb.ca.gov](mailto:jenette.kwong@arb.ca.gov)>; Andrews, Paul@ARB <[Paul.Andrews@arb.ca.gov](mailto:Paul.Andrews@arb.ca.gov)>; Densberger, Matthew@ARB <[Matthew.Densberger@arb.ca.gov](mailto:Matthew.Densberger@arb.ca.gov)>  
**Subject:** RE: Reference Documents for Thursday's Call

Hi Jin,

Yes, here are the numbers. I'll send the invitation out now as well. All the best,

Rory

Conference phone number: **Redacted**  
Conference ID: **Redacted**

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**From:** Xu, Jin@ARB <[jin.xu@arb.ca.gov](mailto:jin.xu@arb.ca.gov)>  
**Sent:** Tuesday, March 12, 2019 9:16 AM  
**To:** Stauffer, Panah <[Stauffer.Panah@epa.gov](mailto:Stauffer.Panah@epa.gov)>; Ramalingam, Ravi@ARB <[Ravi.Ramalingam@arb.ca.gov](mailto:Ravi.Ramalingam@arb.ca.gov)>; Whitney, Daniel@ARB <[daniel.whitney@arb.ca.gov](mailto:daniel.whitney@arb.ca.gov)>  
**Cc:** Mays, Rory <[Mays.Rory@epa.gov](mailto:Mays.Rory@epa.gov)>; Smith, Noah <[SMITH.NOAH@EPA.GOV](mailto:SMITH.NOAH@EPA.GOV)>; Kwong, Jenette@ARB <[jenette.kwong@arb.ca.gov](mailto:jenette.kwong@arb.ca.gov)>; Andrews, Paul@ARB <[Paul.Andrews@arb.ca.gov](mailto:Paul.Andrews@arb.ca.gov)>; Densberger, Matthew@ARB <[Matthew.Densberger@arb.ca.gov](mailto:Matthew.Densberger@arb.ca.gov)>  
**Subject:** RE: Reference Documents for Thursday's Call

Thank you, Panah. Talk to you on Thursday.

Panah and Rory – Could you please let me know which number we can call you on Thursday?

Thanks,  
Jin

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**From:** Stauffer, Panah <[Stauffer.Panah@epa.gov](mailto:Stauffer.Panah@epa.gov)>  
**Sent:** Tuesday, March 12, 2019 8:58 AM  
**To:** Xu, Jin@ARB <[jin.xu@arb.ca.gov](mailto:jin.xu@arb.ca.gov)>; Ramalingam, Ravi@ARB <[Ravi.Ramalingam@arb.ca.gov](mailto:Ravi.Ramalingam@arb.ca.gov)>; Whitney, Daniel@ARB <[daniel.whitney@arb.ca.gov](mailto:daniel.whitney@arb.ca.gov)>  
**Cc:** Mays, Rory <[Mays.Rory@epa.gov](mailto:Mays.Rory@epa.gov)>; Smith, Noah <[SMITH.NOAH@EPA.GOV](mailto:SMITH.NOAH@EPA.GOV)>; Kwong, Jenette@ARB <[jenette.kwong@arb.ca.gov](mailto:jenette.kwong@arb.ca.gov)>; Andrews, Paul@ARB <[Paul.Andrews@arb.ca.gov](mailto:Paul.Andrews@arb.ca.gov)>; Densberger, Matthew@ARB <[Matthew.Densberger@arb.ca.gov](mailto:Matthew.Densberger@arb.ca.gov)>  
**Subject:** Reference Documents for Thursday's Call

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Hi Jin, Ravi and Daniel,

My name is Panah and I'm a new member of the Air Planning team at Region 9. I'm going to be working on the California iSIP and I look forward to speaking with you on Thursday.

As Rory mentioned, since it sounds like some of the conflict of interest provisions changed, we'll need some more information on the changes. The attached documents are what we used to incorporate the rules by reference into the SIP in 2014. We'll need something similar to incorporate the latest provisions. We'll also need a redline/strikeout version to show what changes were made. We can talk about this on Thursday.

Thanks very much and looking forward to working with you,  
Panah

Panah Stauffer  
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